DR. LEROY A. GARRETT

PRO SE REPRESENTATIVE FOR ~23,000 PETROLEUM HOLOCAUST VICTIMS 832-652-7912 | Iry_garrett@yahoo.com | 6725 S Fry Rd. Ste 700 – 338 Katy Texas 77494

October 29, 2025

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE CRYSTALLEX INTERNATIONAL CORP.,

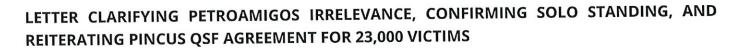
Plaintiff,

٧.

BOLIVARIAN REPUBLIC OF VENEZUELA, et al.,

Defendants.

Case No. 1:17-mc-00151-LPS



Dear Judge Stark:

I, Leroy A. Garrett, pro se, notify the Court that Petroamigos (Venezuelan NGO, unregistered in U.S.) is irrelevant to my associational standing for 23,000 PDVSA workers (2002-2003 Petroleum Holocaust victims). It ceased support due to Venezuela's crisis (OAS/IACHR Report, Jan. 7, 2025). I stand alone, authorized by sworn affidavits, law degrees (USM Venezuela 1992; Purdue 2014), and precedents (*Vaca v. Sipes*, 386 U.S. 171 (1967); *Hunt v. Wash. State Apple*, 432 U.S. 333 (1977)).

My Crystallex participation centered on agreeing to the Pincus-headed QSF commission (my proposal, D.I. 1963 et al.)—more relevant than standing—securing 5% reservation (~\$150M Citgo proceeds) for victims. Unapetrol/Medina's breach (Vaca) left this gap; affidavits fill it (Haines v. Kerner, 404 U.S. 519 (1972)).

Request: Reconsider intervention; reserve QSF share pending Hall ruling (1:24-cv-00380-JLH, D.I. 46-49).

Thank you.

Dr. Lerov A. Garrett

Pro Se Representative for ~23,000 Petroleum Holocaust Victims